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Attorneys for Defendants  
 SILICON VALLEY ANIMAL CONTROL  
 AUTHORITY, AL DAVIS, ANTJE MORRIS  
 AND CITY OF CAMPBELL

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE

LEE JACKSON and KENNETH JACKSON,	)	Case No. C07 05667 RS
	)	
Plaintiffs,	)	DECLARATION OF ANTJE
	)	MORRIS IN SUPPORT OF
v.	)	DEFENDANTS SILICON
	)	VALLEY ANIMAL CONTROL
SILICON VALLEY ANIMAL CONTROL	)	AUTHORITY, AL DAVIS, ANTJE
AUTHORITY, CITY OF SANTA CLARA, CITY	)	MORRIS AND CITY OF
OF CAMPBELL, HUMANE SOCIETY SILICON	)	CAMPBELL'S MOTION FOR
VALLEY DOES 1 TO 20,	)	SUMMARY JUDGMENT, OR IN
	)	THE ALTERNATIVE, PARTIAL
Defendants.	)	SUMMARY JUDGMENT

Date: September 3, 2008  
 Time: 9:30 a.m.  
 Courtroom: 4, 5th Floor  
 Judge: Hon. Richard Seeborg

I, ANTJE MORRIS, declare as follows:

1. I have personal knowledge of the following facts, and could and would testify competently thereto if called upon to do so.
2. I am currently employed as an Animal Control Officer with the Silicon Valley Animal Control Authority ("SVACA"). I have held this position since August 13, 2001. Prior to that, I was employed by the Humane Society Silicon Valley in the following positions: Kennel Coordinator (1997); Euthanasia Trainer (1996); Animal Care Technician (1994). My education and training in the field of

1 animal safety, health and protection consists of the following: Animal Cruelty Investigator's School  
2 Level III Certificate (2004); Animal Cruelty Investigator's School, Level I Certificate (2002); Laws of  
3 Arrest, Search and Seizure, Penal Code § 832 Certificate (2002); California State Humane Academy  
4 Certificate (2002); various animal care and control seminars. I am familiar with SVACA's policies,  
5 procedures and practices for creating and retaining reports and other records of its activities, including  
6 investigations and seizures.

7 3. On December 19, 2005, at approximately 2:00 p.m., I responded to a humane  
8 investigation at a Mervyn's parking lot located at El Camino Real and Scott Boulevard in Santa Clara,  
9 California, regarding numerous animals living in poor conditions inside a motor home.

10 4. I made contact with Lee Jackson, who identified herself as the owner of the animals  
11 inside the motor home. I introduced myself and explained the reason for my visit. Ms. Jackson brought  
12 two dogs out of the motor home for me to inspect. One was wearing a diaper to control bleeding, and  
13 the other was suffering from a broken jaw.

14 5. Based on the condition of the dogs I inspected, I made the decision to enter the motor  
15 home. I was appalled by the clutter and strong stench of ammonia resulting from urine. Four dogs were  
16 tied to a couch, one to a bathroom cabinet and one to the kitchen stove. I noticed that the small dogs  
17 were underweight. I observed that their coats were matted and their nails overgrown. At the rear of the  
18 motor home, two cat "condominiums" housed six cats each, one housed two feral cats, and a smaller  
19 condominium contained the remaining cat. The litter boxes contained large amounts of fecal matter, and  
20 there were numerous flies inside the motor home. I observed that the cats exhibited health problems  
21 such as shriveled ears, sneezing, and discharge from their eyes and nose.

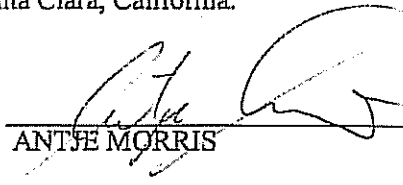
22 6. I thereupon exited the motor home and called SVACA dispatch for assistance. SVACA  
23 Officer Davis arrived at the scene. Officer Davis and I determined that the animals would be removed  
24 from the motor home immediately pursuant to Penal Code § 597.1(a) in order to protect their health and  
25 safety. I took photographs of the interior of the motor home. True and correct copies of these  
26 photographs are attached hereto as Exhibit A and incorporated by this reference.

27 7. On December 20, 2005, I prepared SVACA Incident Report # A05-025973, which  
28 accurately recorded the events surrounding the seizure of December 19, 2005. A true and correct copy

1 of this report is attached hereto as Exhibit B and incorporated by this reference.

2 I swear under penalty of perjury under the laws of the State of California that the foregoing is  
3 true and correct to the best of my own personal knowledge.

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5 Executed this 30<sup>th</sup> day of July, 2008, in Santa Clara, California.

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8 ANTJE MORRIS  
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